

EXHIBIT 1-9

- d. FIB, knowing it was not the rightful owner of the four Ayr CCB bank account funds, fraudulently and purposefully asserted itself as the owner of said accounts.
139. The Funds should have been an asset of Ayr's SBP and available to pay plaintiffs; however, forces behind the scene caused CCB to be seized and put in receivership.
140. On June 20, 2014, in the wake of the raid on Bulgarian banks, BNB appointed two Conservators over CCB's bank assets, and on June 25, 2014, Stanislav Georgiev Lyutov and Elena Sdravkova Kostadinchev. We appointed by BNB as replacement CCB Conservators.
141. On June 22, 2014, BNB announced in a press release that CCB would open for business on July 21, 2014.
142. Starting in June 2014, the bank was closed for four months despite BNB having stated on April 30, 2014 that CCB was in deed in good financial condition exceeding the general capital requirements mandated by the Bulgarian banking system at that time. BNB and the BNB Conservators marshalled all CCB assets based on BNB's direction, including the Funds. They forbade transfer of any assets to external persons, but permitted internal CCB offsetting transfers.
143. On July 11, 2014, the Bulgarian bankruptcy court in APD's proceedings ordered that the Funds as an asset of Ayr be transferred to Bulgarian Development Bank, AD, a government bank.
144. On September 25, 2014, APD's Trustee informed the court that BNB and the BNB conservators refused to effectuate the court's July 11, 2014, order to transfer APD's CCB accounts to the Bulgarian Development Bank, AD.
145. On August 15, 2014, BNB directed the Conservators to, in a limited fashion, make payments on CCB account holders' outstanding CCB loans.

146. APD had no such loan with CCB.
147. On October 22, 2014, FIB creates on its server a payment order that APD's CCB bank accounts be titled in favor of FIB. FIB had no CCB loan.
148. APD's trustee refused to sign or consent to the payment order.
149. Therefore, on October 24, 2014, upon information and belief, FIB forged the signature of ADP Trustee Apostolov and submitted it to the BNB CCB Conservators to authorize the release of the Funds.
150. CCB then applied the Funds to satisfy the debts of the Five Companies, and Ayr lost its only bankruptcy asset.
151. On November 7, 2014, the BNB CCB Conservators issued Order No. 3-2785 freezing the CCB accounting system as of November 6, 2014.
152. On November 10 and 13, 2014, BNB issued two conforming APD Bank Account statements at the request of the ADP Trustee reflecting an account balance of \$65,576,106 (BGN 102,966,946).
153. On November 17, 2014, BNB through its BNB Conservators over CCB issued a false recording of accounting event as "Reference: 0" dated October 30, 2014 which recorded a transfer of accounts receivables dated October 30, 2014 between FIB as transferor and Cibole Services Incorporated Bulgaria, EOOD, as transferee in the amount of \$10,897,435 (BGN 17,000,000); between FIB (transferor) and Droslian Bulgaria, EOOD (transferee) in the amount of \$10,776,856 (BGN 16,811,896); between FIB (transferor) and Tabak Market, AD (transferee) in the amount of \$22,051,282 (BGN 34,400,000); between FIB (transferor) and Promishleno Stroitelstvo Holding, EAD (transferee) in the amount of \$2,934,739 (BGN 4,578,163.30) and \$1,578,413 (BGN

2,462,325.60); and between FIB (transferor) and Vili Vist, EAD (transferee) in the amount of \$6,671,153 (BGN 10,407,000).

154. After the above deductions, the balance in ADP's account should have been approximately \$11,094,591 (BGN 17,307,563).

155. As the bank account had a positive balance there was no basis for the BNB or the BNB Conservators to close the account. However, upon information and belief, on December 1, 2014, the BNB Conservators closed the ADP account, presumably took the balance for themselves or otherwise transferred the funds, and falsely reflected the APD accounts as having a zero balance.

156. On December 1, 2014, BNB issued an APD Bank Account statement reflecting an October 24, 2014 transfer to FIB, despite the November 6, 2014 freeze order.

157. Also on December 1, 2014, BNB issued an "Exposition of APD Bulgaria's" CCB accounts which reflected a balance of zero, with an accounting date of November 6, 2014.

158. Upon information and belief, Ayr's asset APD CCB bank accounts were closed because there were no longer any CCB loans to be paid off.

159. All of these actions with ADP's accounts holding the Funds were done without the consent or authorization of U.S. Bankruptcy Court Ayr Trustee, which proceedings had commenced on October 10, 2014 and subject to the automatic stay provision of U.S. Bankruptcy law.

160. BNB and the conservators owed the highest standard of care as fiduciaries to plaintiffs in their capacity of supervising receivership organization and appointed conservators, all of whom oversaw the payment orders related to the Funds.

161. Based on this activity, FIB ultimately became the title holder in the CCB bank accounts which held The Funds.

FIB Steals the Funds from Ayr to Relieve Debt of the Five Bulgarian Companies Owned or Controlled by Politician Delyan Peevski

162. As previously stated, on October 22, 2014, FIB created on its server a payment order that APD's CCB account be titled in favor of FIB.
163. Upon information and belief, FIB did not have a CCB loan. Therefore, FIB needed a debt holder in order to transfer the Funds because of the pre-existing BNB order which restricted the BNB Conservators to only making payments on the CCB account holders' outstanding CCB loans.
164. Upon information and belief, Petrol, AD, was a Bulgarian registered company operating a gas station chain business in Bulgaria. The scheme to obtain the Funds from CCB to pay off the debts of the Five Companies was initially to be effectuated through Petrol, AD as a CCB debt holder.
165. Enter Peevski. Delyan Slavchev Peevski is a politician, oligarch, entrepreneur and media mogul. He has a sketchy history as a politician popping in and out of parliament and several administrations since 2004. He has been a Member of the Bulgarian Parliament representing the MRF. In June 2013, Peevski was appointed and confirmed as President of the State Agency for National Security. He was removed after months of street protests across the entire country of Bulgaria, and NATO States lodged objections to his appointment, which culminated in the fall of the Bulgarian government over his appointment.
166. Upon information and belief, Peevski operates through his companies registered in his mother's name and a variety of shell companies, which serve to disguise his operational direction of those entities. Consequently, he effectively controls 90% of Bulgaria's print and television media.

167. Upon information and belief, Peevski and members of his family were heavily indebted to CCB: by November 2013, they had borrowed more than \$268,000,000 (€200,000,000) to acquire media properties and other companies in Bulgaria.
168. Upon information and belief, Peevski orchestrated and joined the conspiracy in the exercise of the VTB call option for a 79.83 % consolidated interest of Bulgartabac in favor of TGI and Faraj.
169. The call option was created to allow the privatized shares of Bulgartabac to be transferred to specific entities or persons. These recipients are the hidden beneficiaries of the privatization.
170. Upon information and belief, three specific forces drove the privatization of Bulgartabac: Peevski, TGI and Faraj.
171. In 2015, Peevski through his company NSN Investment EOOD, became, within a few month, the official owner in the following Bulgarian companies: 5% ownership of Bulgartabac Holding, and 18% of Yurii Gagarin, AD. Upon information and belief, this was his commission for the orchestration of the VTB Bulgartabac call option and the removal of corporate debts, ultimately in favour TGI and Faraj.
172. Bulgarian cigarette filter and packaging producer Yurii Gagarin BT was established in 1964 as part of the then communist state-owned tobacco monopoly Bulgartabac. It was transformed into a unit of the state tobacco firm in November 1993 when Bulgartabac was split into a holding structure with 22 subsidiaries. Its product range features cigarette filters, paper boxes, tobacco manufacturing equipment and facilities as well as printing of box labels. Yurii Gagarin BT serves mainly the cigarette-making subsidiaries of Bulgartabac Holding—85% of its 2005 revenue came from deals within the group.